



Oregon

John A. Kitzhaber, MD, Governor

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Environmental
Cleanup Office

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8/25/11 11:21 AM

July 6, 2011

Also Sent Via E-mail

Mr. Robert J. Wyatt
NW Natural
220 N.W. Second Avenue
Portland, OR 97209

**Re: Notice of Intent to Dispose of Soil Investigation Derived Waste
NW Natural – “Gasco Site”
Portland, Oregon
ECSI #84**

Dear Mr. Wyatt:

The Department of Environmental Quality (DEQ) reviewed the “Intent to Dispose of Non-Hazardous Petroleum-Contaminated Investigative-Derived (IDW) Soils generated by NW Natural on the Siltronic Corporation Property, 7200 NW Front Avenue, Portland, Oregon” dated August 5, 2010 (IDW Notification). Hahn and Associates, Inc. prepared the IDW Notification on behalf of NW Natural. The IDW Notification provides the results of analyzing a composite sample of soil IDW and informs DEQ of NW Natural’s intent to dispose of the material at the Hillsboro Landfill.

DEQ understands from reviewing the IDW Notification that:

- The IDW consists of soil cuttings produced in August 2009 while using an air-knife to clear the P-34 boring location for utilities prior to conducting push-probe drilling.
- Boring P-34 is located on the Siltronic Corporation (Siltronic) property, reportedly within the “TCE contaminated material management area.”
- Soil IDW is currently stored in a single 55-gallon drum located on NW Natural’s property.
- Three discrete samples were collected from the drum and combined to make a single composite sample for analysis.
- The composite sample was analyzed for volatile organic compounds (VOCs); gasoline-range, diesel-range and oil range petroleum hydrocarbons; metals (i.e., arsenic, barium, cadmium, chromium, lead, mercury, selenium, and silver); polycyclic aromatic hydrocarbons; total cyanide; and free liquids.
- Trichloroethene, cis-1,2-dichloroethene, trans-1,2-dichloroethene, 1,1-dichloroethene, and vinyl chloride were not detected at or above the laboratory method reporting limit in the composite sample.

NW Natural concludes from analytical testing the IDW described above can be transported to the Hillsboro Landfill; a land disposal facility that meets Subtitle D liner design requirements. DEQ concurs with NW Natural’s plan. DEQ’s concurrence is based on the review process and

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disposal criteria previously used at the site and is contingent on the receiving facility accepting the material.

NW Natural and Siltronic will be undertaking in-water work with oversight by the U.S. Environmental Protection Agency. As part of planning and preparing for in-water work, a Special Waste Management Plan (SWMP) will be prepared to establish criteria and procedures for managing and disposing contaminated soil and/or sediment offsite. The SWMP is being developed because future uplands and in-water removal/remedial actions have the potential to produce large volumes of contaminated material, and for this material to be managed through offsite disposal in state-permitted landfills meeting Subtitle D design and monitoring requirements. Depending on the constituents present and their concentrations, offsite management could involve special handling of contaminated media (e.g., treatment) prior to disposal. As such, procedures for managing, handling, and disposing of contaminated material are subject to change in the future.

Please don't hesitate to contact me if you have questions regarding this letter.

Sincerely,



Dana Bayuk
Project Manager
Portland Harbor Section

Cc: Jeff Payson, NW Natural
Patty Dost, Pearl Legal Group
Rob Ede, Hahn & Associates
Ben Hung, Anchor QEA
John Edwards, Anchor QEA
Carl Stivers, Anchor QEA
Tim Stone, Anchor QEA
Myron Burr, Siltronic Corporation
Tom McCue, Siltronic Corporation
Alan Gladstone, Davis Rothwell Earle and Xochihua
James Peale, Maul Foster & Alongi, Inc.
Sean Sheldrake, EPA
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Jim Anderson, NWR/PHS
Tom Gainer, NWR/PHS
Henning Larsen, NWR/SRS
ECSI No. 84 File
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